

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Lakes and Parks Alliance of Minneapolis,
a Minnesota non-profit corporation,

Plaintiff,

v.

Metropolitan Council, a public corporation
and political subdivision of the State of
Minnesota,

Defendant.

File No. 0:14-cv-03391-JRT-SER

**DEFENDANT METROPOLITAN
COUNCIL'S MOTION FOR
PROTECTIVE ORDER**

Defendant Metropolitan Council, by and through its counsel, Lockridge Grindal Nauen P.L.L.P., respectfully moves this Court for entry of a Protective Order stating that: (1) the above-captioned matter is an action for review on an administrative record; (2) pursuant to Rule 26(a)(1)(B) of the Federal Rules of Civil Procedure, the above-captioned matter is exempted from initial disclosures; and (3) Plaintiff Lakes and Park Alliance of Minneapolis, is not entitled to discovery without leave of the Court and that Plaintiff has not made sufficient showings for such leave to be granted.

Defendant's Motion for Protective Order is based upon the grounds set forth in the memorandum of law which Defendant will submit pursuant to the Federal Rules of Civil Procedure and Local Rule 7.1 and all of the files, records and proceedings in this matter.

Dated: December 28, 2015

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/David J. Zoll

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